

# PLANNING DEPARTMENT

## IMPERIAL COUNTY

PLANNING / BUILDING INSPECTION / PLANNING COMMISSION / A.L.U.C. / L.A.F.Co.

Jurg Heuberger - Director

October 28, 1996

Tim Vasquez, Chief  
Environmental Analysis Branch "A"  
CALTRANS District 11  
P. O. Box 85406  
San Diego, CA 92186-5406

SUBJECT: Response to Notice of Preparation (NOP)  
Draft Env. Impact Report/Statement (DEIR/S)

Dear Mr. Vasquez:

The Planning/Building Department on October 17, 1996, received a copy of the CALTRANS Notice of Preparation for a DEIR/EIS for the route alignment of State Routes 78 and 111 in Imperial County proposed as a four lane limited access expressway. In addition to any previous comments that have been provided to your office, other agencies such as the County Agricultural Commissioner on impacts to farmland may provide a separate response.

The potential impacts to County roads and other transportation-related issues may be coordinated through the County Department of Public Works and its staff.

Some of the environmental resources and issues that were listed in the NOP were "...wetlands, floodway and floodplain, wildlife habitat, prime farmlands and farmlands of State Importance, growth inducement, economic, home and business relocation, noise, changes to vehicle traffic patterns, regional air quality, seismic exposure, land use planning, hazardous waste, and irrigation/drain systems. No historic properties are known to exist at this time within the project study corridor..."

Your letter indicates that there is a deadline of 45 days to respond from the date of receipt (October 17th) from all responsible/cooperating agencies. The following are a few of the concerns on the NOP, and the Department reserves the right to comment more fully when the Draft EIR/EIS has been received.

As a responsible agency pursuant to the provisions of CEQA and NEPA, we offer the following comments and respectfully request that each be comprehensively addressed in the EIR/EIS.

(1) The Map identifies the New River which flows through the Bypass Study Area and the U.S. Fish and Wildlife Service and the State Department of Fish and Game should be contacted and would be able to provide your agency with appropriate comments on the impacts of any of the Bypass alternatives on the New River and any "wetlands" which may be affected.

For "wildlife habitat" within the New River environs and the Imperial Irrigation District drains, the above-mentioned agencies would be the appropriate contact agencies.

(2) The Bypass Study Area includes the New River that is within the "Zone A", 100-year flood area, as identified in the adopted FEMA Flood Insurance Maps, Community Panels Number 060065-600B, dated March 15, 1984, construction of a bridge and related flood control structures within this zone should be addressed in the Draft EIR/EIS.

(3) The impacts on "prime farmlands and farmlands of statewide importance" can be addressed through contacts with the County Agricultural Commissioner's Office. This office also handles the regulation of air quality as the Air Pollution Control District and any "regional air quality" issues can be addressed through its review process.

(4) The proposed four lane limited access expressway could cause "growth inducement", "economic impacts", and "home/business relocation" in the City of Brawley and the adjacent County environs. The County's Circulation/Scenic Highways Element should be referenced for this project and any impacts be coordinated through the Public Works Department.

The Bypass Study Area is also within the Brawley "Urban" area as designated in Imperial County's Land Use Element, adopted on November 9, 1993. The Study Area is also within the City's "Sphere of Influence" and the City should be contacted for potential impacts to this area.

The Luckey Ranch Annexation is being processed through the Local Agency Formation Commission as well as various approvals by the City of Brawley which you may be aware of at this time and all of the above should be addressed in the Draft EIR/EIS.

(5) The increased "noise" impacts to County and City residents should be addressed for the increased traffic on State Highway 111 and any noise impacts to local residents should be mitigated as appropriate in the Draft EIR/EIS. The County's Noise Element should be referenced for noise restrictions, studies and related issues.

(6) As discussed previously, the "changes to vehicle traffic patterns" should be addressed through contact with the Public Works Department and a review of the Circulation/Scenic Highways Element of the County General Plan and the City of Brawley's Circulation Element.

(7) The County is within the Seismic Zone 4 area and "seismic exposure" is a critical concern for any proposed project anywhere in Imperial County and should be addressed in the Draft EIR/EIS.

(8) As discussed previously, "land use planning" for this Bypass Study Area should be addressed through a review of the Land Use Element of the 1993 County General Plan as well as impacts to the City of Brawley and its planning activities for this Study Area.

(9) It is unclear what "environmental resources and issues", are regarding "hazardous waste". Does this concern involve hazardous waste shipments and potential accidents on any proposed Bypass alternative which crosses the New River, or on the new four lane accessway? Without further information on what is referred to, it is difficult to address at this time.

With increased traffic there is the potential risk of spills of hazardous materials/waste and potential risks to air, farmlands, surface waters, and emergency planning along any new Bypass alternative that is ultimately selected.

(10) With regard to modifying or changing "irrigation/drain systems", the Imperial Irrigation District should be contacted for possible impacts to their system within the Study Area.

(11) The NOP indicates that there are no "historic properties" known to exist within the Study Area. However, a cultural resources study by a qualified archaeologist should be undertaken adjacent to the New River to confirm whether or not significant resources were present.

(12) The Draft EIR/EIS needs to address how "fill" (soil, sand and gravel) will be obtained for the construction of the Brawley Bypass and where it will come from to the site.

In the event CALTRANS plans to contract out this construction, adequate time must be provided for them to obtain any necessary permits that may be required from local government.

Thank you for the opportunity to comment on this proposal. We look forward to reviewing the proposed Draft EIR/EIS on this project.

If you have any questions, please contact this Department.

Sincerely,

**JURG HEUBERGER, AICP**  
Planning Director

by: *Richard Cabanilla*  
**Richard Cabanilla**  
Planning Division Manager

cc: Rich Inman, County Administrative Officer  
John L. Morrison, Asst. Planning Director  
Richard Cabanilla, Planning Division Manager  
John Armas, Public Works Director  
Steve Birdsall, Agricultural Commissioner  
Joe Buzo, County Fire/OES  
Tom Wolf, Environmental Health Services  
CALTRANS File  
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